

Monte J. White & Associates, P.C.
1106 Brook Ave
Wichita Falls, TX 76301
(940)723-0099
(940)723-0096 Fax

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

In Re: §
Wanda Sue Coffman § Case No. 13-70390-hdh-13
§ Chapter 13
Debtor §

DEBTOR'S MOTION TO EXTEND AUTOMATIC STAY

Comes Now Debtor, by counsel, and for this Motion states as follows:

1. Debtor filed for relief under Chapter 13 in the Northern District of Texas. This is a core proceeding.
2. Debtor was a debtor in a prior case during the preceding year. To-wit: Chapter 13, Case No. 11-70120-HDH-13 filed on 3/30/2011.
3. Debtor seeks an extension of the automatic stay imposed for 30-days pursuant to 11 U.S.C. §362(c)(3)(A), as to all creditors until further order or discharge to effectuate an orderly reorganization, pursuant to 11 U.S.C. §362(c)(3)(B).
4. Debtor's prior case was dismissed for: Failure to make payments. Debtor broke her elbow December 2012 and could not work her mail carrier route or her part time job. Debtor paid a substitute carrier for January through March. She returned to her part time job in April.
5. The following changes of circumstances demonstrate that the Debtor can perform this plan and is likely to complete the case successfully: Debtor will be able to make her trustee payment of \$395.00 with income from Social Security of \$209.00, retirement \$2,059.52 and part-time job averaging \$822.85. Debtor will sell her house in order to make the balloon payment of \$9,100.00. Debtor is re-filing in order to release IRS levy on her Social Security and pay her IRS liability.

WHEREFORE, Debtor requests this Court enter its order continuing the automatic stay under §362(a) in this proceeding as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2) or a motion for relief is granted under §362(d).

Respectfully submitted,

/s/Monte J. White, Attorney for Debtor

CERTIFICATE OF CONFERENCE

On October 14, 2013, the office of Monte J. White & Associates, P.C., contacted Marc McBeath, Counsel for the Chapter 13 Trustee, was advised that the Trustee does not oppose the motion.

/s/Monte J. White, Attorney for Debtor

CERTIFICATE OF SERVICE

A true and exact copy of the foregoing Motion and Notice of Hearing was served electronically by the ECF System or by First Class Mail on October 22, 2013, on all parties on the mailing matrix:

/s/Monte J. White
Attorney for Debtor

Alliance One Receivables Management
P.O. Box 211128
Eagan, MN 55121-1128

Seymour Hospital Rural Health
201 Stadium Drive
Seymour, Texas 76380

Bank Of America
201 N Tryon St
Charlotte, NC 28255

Wichita Falls Tfcu
3001 Carter Ave
Wichita Falls, TX 76308

Baylor County Appraisal District
211 N. Washington
Seymour, TX 76380

Capital One
PO Box 85015
Richmond, VA 23285

Davis & Wardlaw Oil Company
PO Box 1040
Seymour, TX 76380

Discover Fin
Pob 15316
Wilmington, DE 19850

InterBank fka Farmer's National
PO Box 872
Seymour, TX 76380

Internal Revenue Service
Special Procedures-Insolvency
PO Box 7346
Philadelphia, PA 19101

MBNA
PO Box 17054
Wilmington, DE 19884

Phillips & Cohen Associates, Ltd
258 Chapman Rd., Suite 205
Newark, DE 19702